

EXHIBIT A

**IN THE UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF OHIO
EASTERN DIVISION**

ROOT, INC., <i>et al.</i> ,	:	Case No. 2:23-cv-00512-SDM-CMV
	:	
Plaintiffs,	:	Judge Sarah D. Morrison
	:	Magistrate Judge Chelsey M. Vascura
v.	:	
	:	
BRINSON CALEB SILVER, <i>et al.</i> ,	:	DECLARATION OF DEFENDANT
	:	WILLIAM CAMPBELL
Defendants.	:	
	:	
	:	
	:	

I, William Campbell, hereby declare under penalty of perjury that the following are true and correct to the best of my knowledge and belief:


1. I am over the age of 18 and reside in California.
2. I do not reside in the State of Ohio and have never resided in the State of Ohio.
3. I do not transact business in the State of Ohio and I have never transacted business in the State of Ohio, I have not solicited work in the State of Ohio and have not advertised my services in the State of Ohio.
4. I have traveled to Ohio twice in my lifetime. One trip took place approximately 15 years ago when I helped my sister move to attend medical school. The second trip occurred in approximately 2008, prior to the formation of Quantasy and when I was acting as a consultant. I traveled to Ohio to assist another company on an advertising pitch.
5. I met Brinson Silver ("Silver") in or around 2018. I understood that Silver resided in California when I met him and that Silver continues to reside in California, including during the period

November 2022 through at least November 2023.

6. I am the Chief Executive Officer of Quantasy & Associates LLC ("Quantasy"), a Delaware corporation with its place of business in California.
7. As part of my responsibilities as CEO of Quantasy, I do negotiate and sign agreements with various customers, vendors and subcontractors and others on behalf of Quantasy from time to time.
8. Silver contacted Quantasy in or about November 2022 about serving as a marketing vendor for Silver's new employer.
9. Over the next several months, I had repeated communications with Silver on behalf of Quantasy and negotiated agreements on behalf of Quantasy with Silver. I had at least one meeting on behalf of Quantasy in person with Silver in Los Angeles, California. I also participated in two or three video conferences on behalf of Quantasy from the Los Angeles office with representatives of Plaintiffs.
10. I communicated with Silver by text message, WhatsApp, and email, as well as in-person meetings, telephone, and occasionally video conference. Silver used his personal email account, both for personal communications and business communications on behalf of Root.
11. I did not travel to Ohio to meet with Plaintiffs or Silver.
12. At all times during the course of these negotiations and the business dealings between Quantasy and Silver, I believed and understood that Silver was located in California and resided in California.
13. I did not enter into any agreements with Silver in my individual, personal capacity.
14. I did not enter into any agreements with Plaintiffs in my individual, personal capacity.

I declare under penalty of perjury that the foregoing is true and correct.

Executed on 5/11, 2023


William Campbell